

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***PERMIT STATEMENT OF BASIS***

TITLE V DRAFT PERMIT - NO. V-99-070  
YUASA-EXIDE, INCORPORATED - TUBING PLANT  
RICHMOND KENTUCKY  
JUNE 7, 2000  
KUMAR POLE, P.E., REVIEWER  
PLANT I.D. # 102-2520-0046  
APPLICATION LOG #F506

**A. SOURCE DESCRIPTION**

Yuasa-Exide, Incorporated (hereafter referred to as "Yuasa") operates a tube manufacturing facility in Richmond, Kentucky. The Standard Industrial Classification (SIC) Code for this facility is 2295 and the product is resin-coated fiberglass tubing used in the manufacture of tubular positive battery plates. The Tubing Manufacturing Plant is an existing major source for volatile organic compounds (VOCs) and single and combined hazardous air pollutants (HAPs).

**B. COMMENTS**

1. Type of control and efficiency:

The only emission point with control equipment is the dust collection system for the two (2) fiberglass tube trimmers and ten (10) tube cutters (all of which are vented through EP 01). The particulate emissions (PM/PM<sub>10</sub>) from EP 01 are controlled by a pulse jet dust collector with an efficiency of ninety-nine percent (99%).

2. Emission factors and their source:

A combination of material balance, local tests, and AP-42 emission factors were used to estimate emissions.

3. Applicable regulations:

- i. 401 KAR 59:010, *New process operations*, applies to the two (2) fiberglass tube trimmers and ten (10) fiberglass tube cutters (EP 01).
- ii. 401 KAR 59:015, *New indirect heat exchangers*, applies to the direct air make-up unit. However, based on a maximum rated capacity of 4.05 mmBTU/hr, this unit is classified as an insignificant activity.

**C. CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.